

T E S L A

sunnova



April 11, 2022

OPEN MEETING AGENDA ITEM

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

RE: Docket No. E-01345A-20-0152, In the Matter of the Application for Approval of Arizona Public Service Company's Distributed Generation Interconnection Manual

Chairwoman Márquez Peterson and Commissioners:

We are writing to ask that the Commission act on APS' pending Interconnection Manual. The Commission has long been a leader on issues critical for the growth of distributed solar and battery storage technologies, and our request is in keeping with that leadership. The Interconnection Rules are a great example of the Commission's foresight – they will save time and money for customers while ensuring that the very latest solar and storage technologies are available to them. Accordingly, we request that you direct Staff to review the Manual and prepare a proposed order for approval at the Commission's May open meeting.

Certain aspects of the APS Manual are not in compliance with the Interconnection Rules, which create ongoing problems that cost consumers money and must be resolved. As the Arizona Solar Energy Industries Association (AriSEIA) described in its August 2021 letter to this docket, when these manuals are not in compliance with the Interconnection Rules, they cause consumers to pay increased costs, endure extended timelines, or even forgo adopting rooftop solar altogether. Indeed, these are the very problems the Commission sought to prevent by enacting the Interconnection Rules in the first place and they will continue until a revised Manual is approved. As such, Staff should quickly propose revisions to the Manual to bring it into compliance with Rules as part of its review.

The APS Manual was first filed more than 600 days ago, while the Interconnection Rules that support it began development 15 years ago. To be sure, the solar industry and distributed

generation customers have waited a very long time for this document to get a hearing in front of the Commission. It is imperative that the Commission take this final – and long overdue – step. Therefore, we respectfully request that the Commission direct Staff to review the Manual and prepare a proposed order for its approval at the May open meeting.

Thank You,



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